

KHALE J. LENHART, #7-4693
TYSON R. WOODFORD, #8-6650
Hirst Applegate, LLP
P. O. Box 1083
Cheyenne, WY 82003-1083
Phone: (307) 632-0541
Fax: (307) 632-4999
klenhart@hirstapplegate.com
twoxford@hirstapplegate.com

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF WYOMING

BCB CHEYENNE LLC d/b/a BISON
BLOCKCHAIN, a Wyoming limited
liability company,

Plaintiff,

vs.

Civil No. 23-CV-79J

MINEONE WYOMING DATA CENTER
LLC, a Delaware limited liability company;
MINEONE PARTNERS LLC, a Delaware
limited liability company; TERRA
CRYPTO INC., a Delaware corporation;
BIT ORIGIN, LTD., a Cayman Island
Company; SONICHASH LLC, a Delaware
limited liability company; BITMAIN
TECHNOLOGIES HOLDING COMPANY,
a Cayman Island Company; BITMAIN
TECHNOLOGIES GEORGIA LIMITED, a
Georgia corporation; and JOHN DOES
1-18, related persons and companies who
control or direct some or all of the named
Defendants,

Defendants.

***MOTION FOR ADMISSION OF MARC FEINSTEIN AND
WILLIAM K. PAO, PRO HAC VICE***

Khale J. Lenhart of HIRST APPLGATE, LLP, counsel for Defendant Bitmain
Technologies Georgia Limited (hereinafter “Bitmain Georgia”), moves this Court for the

HIRST APPLGATE, LLP
LAW OFFICES
P.O. Box 1083
CHEYENNE, WYOMING 82003-1083

admissions of Marc Feinstein and William K. Pao, *pro hac vice*, for the purpose of representing Bitmain Georgia herein and in support thereof, states the following:

1. Khale J. Lenhart is an attorney licensed to practice law in the State of Wyoming, is admitted in this Court and is a member in good standing of the bar of the State of Wyoming and the United States District Court for the District of Wyoming.

2. Khale J. Lenhart or some other attorney of Hirst Applegate will assist Marc Feinstein and William K. Pao in the representation of the Defendant Bitmain Georgia herein.

3. Marc Feinstein is an attorney of the law firm of O'Melveny & Myers LLP, 400 South Hope Street, 18th Floor, Los Angeles, CA 90071, 213-430-6000, mfeinstein@omm.com. Marc Feinstein is an attorney licensed to practice law in the state of California and is a member in good standing of the United States District Court for Central, Southern, and Northern Districts of California and the United States Court of Appeals for the Ninth Circuit.

4. William K. Pao is an attorney of the law firm of O'Melveny & Myers LLP, 400 South Hope Street, 18th Floor, Los Angeles, CA 90071, 213-430-6000, wpao@omm.com. William K. Pao is an attorney licensed to practice law in the state of California and is a member in good standing of the United States District Court for Central, Eastern, Northern, and Southern Districts of California, the United States Court of Appeals for the Fifth, Ninth, and Seventh Circuits, and the United States Supreme Court.

5. Based on available information and belief, Khale J. Lenhart vouches for the good moral character and veracity of Marc Feinstein and William K. Pao.

6. Khale J. Lenhart or some other attorney with Hirst Applegate, LLP will continue to act as counsel for Defendant Bitmain Georgia herein and will be present in Court during all proceedings in connection with the case, unless excused and will have full authority to act for and on behalf of the client on all matters, including Pretrial Conferences, as well as trial and other hearings.

7. Marc Feinstein and William K. Pao understand that upon their admission for purposes of this proceeding, they are deemed thereby to have conferred disciplinary jurisdiction upon this Court for any alleged misconduct arising in the course of or in the preparation of such proceeding.

8. Pursuant to U.S.D.C.L.R. 84.2(b), attached hereto are the Affidavits of Marc Feinstein and William K. Pao in support of their requests for admission.

9. The requisite fee for admission of attorneys pro hac vice will be provided to the Court.

Dated: 13 December 2023.

BITMAIN TECHNOLOGIES GEORGIA
LIMITED, Defendant

BY: s/Khale J. Lenhart

KHALE J. LENHART, #7-4693
TYSON R. WOODFORD, #8-6650
OF HIRST APPLGATE, LLP
Attorneys for Defendant Bitmain Georgia
P. O. Box 1083
Cheyenne, WY 82003-1083
Phone: (307) 632-0541
Fax: (307) 632-4999
klenhart@hirstapplegate.com
twoodford@hirstapplegate.com

CERTIFICATE OF SERVICE

I certify the foregoing ***Motion for Admission of Marc Feinstein and William K. Pao, Pro Hac Vice*** was served upon all parties to this action pursuant to the Federal Rules of Civil Procedure on 13 December 2023, and that copies were served as follows:

Patrick J. Murphy, #5-1779
Scott C. Murray, #7-4896
Williams, Porter, Day & Neville, P.C.
159 North Wolcott, Suite 400
P. O. Box 10700
Casper, WY 82602-3902
pmurphy@wpdn.net
smurray@wpdn.net
Attorneys for Plaintiff

☐ U.S. MAIL
☐ FED EX
☐ FAX
☐ HAND DELIVERED
☐ EMAIL
☒ E-FILE

Sean M. Larson, #7-5112
Kari Ann Hartman, #8-6507
Hathaway & Kunz, LLP
P. O. Box 1208
Cheyenne, WY 82003-1208
slarson@hkwyolaw.com
khartman@hkwyolaw.com
*Attorneys for Defendants Mineone, Terra Crypto, Bit
Origin, Sonichash*

☐ U.S. MAIL
☐ FED EX
☐ FAX
☐ HAND DELIVERED
☐ EMAIL
☒ E-FILE

Paula Colbath, *Pro Hac Vice*
Sarah Levitan Perry, *Pro Hac Vice*
Loeb & Loeb, LLP
345 Park Avenue
New York, NY 10154
pcolbath@loeb.com
sperry@loeb.com
*Attorneys for Defendants Mineone, Terra Crypto, Bit
Origin, Sonichash*

☐ U.S. MAIL
☐ FED EX
☐ FAX
☐ HAND DELIVERED
☐ EMAIL
☒ E-FILE

s/Norma J. Hubka
OF HIRST APPLGATE, LLP
Attorneys for Defendant Bitmain